

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**Office of the Chief Financial Officer**

Natwar M. Gandhi  
Chief Financial Officer



**MEMORANDUM**

**TO:** The Honorable Linda W. Cropp  
Chairman, Council of the District of Columbia

**FROM:** Natwar M. Gandhi  
Chief Financial Officer

**DATE:** April 20, 2001

**SUBJECT:** Fiscal Impact Statement: "Title V Operating Permit  
Amendments and NO<sub>x</sub> Budget Trading Program Resolution of  
2001"

**REFERENCE:** Draft Legislation – Bill Number Not Available ([B 14-167](#))

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**Conclusion**

Funds are sufficient in the FY 2001 budget and the FY 2002 through FY 2005 budget and financial plan. Implementation of the components of the proposed legislation will not require any additional staff or resources. The proposed legislation will have no impact on General Fund revenue.

**Background**

The proposed resolution amends the requirements for the Title V Operating Permit program. The amendments will be to Chapter 3 of Title 20 of the District of Columbia Municipal Regulations and are minor technical changes requested by the U.S. Environmental Protection Agency (USEPA) as a condition of granting final approval of the District's Title V Permit program. These regulations are necessary to comply with the Federal Clean Air Act. These regulations help the District monitor and control environmental pollutants caused through manufacturing and other industry operating in the District of Columbia.

Failure to implement the proposed rules will result in the USEPA denying the final program approval and implementing the full Title V Operating Permit program. If this

becomes the case the USEPA would receive emissions fees now received by the District and issue permits under federal rather than local authority.

### **Financial Plan Impact**

Funds are sufficient in the FY 2001 and the proposed FY 2002 through FY 2005 budget and financial plan because no additional funds or resources will be required. Failure to implement the proposed regulations by USEPA deadlines will result in a revenue loss for the District.

Currently the District charges \$35 per ton of emissions which equates to \$250,000 in annual revenue from the permitting by the Air Quality Division of the District's Department of Health.